

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Lillian Vignola,)	No.: 16 cv 00713
)	
Plaintiff,)	Jury Trial Demanded
)	
v.)	
)	
151 North Kenilworth Condominium Association,)	The Honorable Judge
Pamela Park, and Kovitz Shifrin Nesbit, A Professional)	Andrea R. Wood
Corporation,)	
)	
Defendants.)	

**PLAINTIFF LILLIAN VIGNOLA'S RESPONSE TO KOVITZ SHIFRIN NESBIT'S AND
PAMELA PARK'S MOTION TO DISMISS THE THIRD CAUSE OF ACTION OF HER
FIRST AMENDED COMPLAINT**

Two defendants, Kovitz Shifrin Nesbit and Pamela Park, have filed a Motion to Dismiss the Third Cause of Action of Plaintiff Lillian's First Amended Complaint. The basis for dismissal is Federal Rule of Civil Procedure 12(b)(6).

Defendants' Motion must be dismissed for the reasons stated in the accompanying memorandum.

WHEREFORE, Plaintiff Lillian Vignola prays this Honorable Court deny Defendants' Motion to Dismiss with prejudice.

Respectfully submitted,

LILLIAN VIGNOLA

/s/ Kelli Dudley

Kelli Dudley
One of the Attorneys for Lillian Vignola

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CERTIFICATE OF SERVICE

I, Kelli Dudley, an attorney, hereby certify that on or before the 27th day of April, 2016, I filed the foregoing Memorandum in Support of Plaintiff's Response to Motion to Dismiss with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Kelli Dudley

Kelli Dudley